

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
(702) 382-2101

Adam P. Segal, Esq.
Nevada Bar No. 6120
Bryce C. Loveland, Esq.
Nevada Bar No. 10132
Christopher M. Humes
Nevada Bar No. 12782
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
Telephone: (702) 382-2101
Facsimile: (702) 382-8135
Email: asegal@bhfs.com
Email: bcloveland@bhfs.com
Email: chumes@bhfs.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE
PLUMBERS AND PIPEFITTERS LOCAL
525 HEALTH AND WELFARE TRUST
AND PLAN; BOARD OF TRUSTEES OF
THE PLUMBERS AND PIPEFITTERS
UNION LOCAL 525 PENSION PLAN;
AND BOARD OF TRUSTEES OF
PLUMBERS AND PIPEFITTERS LOCAL
UNION 525 APPRENTICE AND
JOURNEYMAN TRAINING TRUST FOR
SOUTHERN NEVADA,

Plaintiffs,

vs.

FRANCISCO GONZALEZ-FARIAS, an
individual; HUDSON INSURANCE
AGENCY, a New York corporation;
MOUNTAIN LION PLUMBING, INC., a
Nevada corporation; GABRIELLA
NAVARRO, an individual; SECURITY
PLUMBING AND AIR CONDITIONING,
a Nevada corporation,

Defendants.

Lead Case No. 2:14-cv-01027-APG-PAL

Consolidated with Case Nos. 2:15-cv-
00824-APG-CWH and 2:15-cv-01148-
LDG-GWF

**NOTICE OF NONOPPOSITION TO
MOTION FOR SUMMARY JUDGMENT**

1 Plaintiffs, the Boards of Trustees of the Plumbers and Pipefitters Union Local 525 Health
 2 and Welfare Trust and Plan, the Plumbers and Pipefitters Union Local 525 Pension Plan, and the
 3 Plumbers and Pipefitters Local Union 525 Apprentice and Journeyman Training Trust for
 4 Southern Nevada (collectively, "Local Trust Funds"), notify the Court that Defendants Security
 5 Plumbing and Air Conditioning, Mountain Lion Plumbing, Inc., Francisco Gonzalez-Farias, and
 6 Gabriella Navarro (collectively "Defendants") have not responded to the Local Trust Funds'
 7 Motion for Summary Judgment (the "Motion"). (ECF No. 71, filed July 6, 2016.) The time to
 8 respond as established by Local Rule 7-2(b) has expired and none of the Defendants have
 9 requested additional time to respond.

10 Pursuant to Local Rule 7-2(d), "[f]ailure of an opposing party to file points and authorities
 11 in response to any motion shall constitute a consent to the granting of the motion." Plaintiffs
 12 therefore request that the Court construe Defendants' failure to oppose as an admission that the
 13 Motion is meritorious, and as consent to grant the Local Trust Funds' Motion for Summary
 14 Judgment.

15 Therefore, the Local Trust Funds respectfully request the Court grant their Motion. A
 16 proposed order is attached as Exhibit 1.

17 Dated: August 12, 2016

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Christopher M. Humes

Adam P. Segal, Esq.

Nevada Bar No. 6120

Bryce C. Loveland, Esq.

Nevada Bar No. 10132

Christopher M. Humes

Nevada Bar No. 12782

100 North City Parkway, Suite 1600

Las Vegas, Nevada 89106-4614

Telephone: (702) 382-2101

Facsimile: (702) 382-8135

Attorneys for Plaintiffs

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
(702) 382-2101

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on August 12, 2016, I served a true copy of the foregoing **NOTICE OF NONOPPOSITION TO MOTION FOR SUMMARY JUDGMENT** upon:

Francisco Gonzalez-Farias
4213 Lower Saxon
North Las Vegas, NV 89085
Telephone: (702) 415-6994

Sara D. Cope, Esq.
Kevin B. Christensen, Esq.
Laura J. Wolff, Esq.
Christensen James & Martin
7440 W. Sahara Ave.
Las Vegas, NV 89117
Telephone: (702) 255-1718
Facsimile: (702) 255-0871
Email: sd@cjmlv.com
Email: kbc@cjmlv.com
Email: ljw@cjmlv.com

Security Plumbing & Air Conditioning
c/o Francisco Gonzalez-Farias - Resident Agent
4213 Lower Saxon
North Las Vegas, NV 89085
Telephone: (702) 415-6994

Gabriella Navarro
4213 Lower Saxon
North Las Vegas, NV 89085
Telephone: (702) 415-0805

Attorneys for Counsel Plaintiffs, Trustees of the Plumbers and Pipefitters National Pension Fund and International Training Fund

Mountain Lion Plumbing, Inc.
c/o Gabriella Navarro - Resident Agent
4008 Alameda Avenue
Las Vegas, NV 89110
Telephone: (702) 415-0805

- ☒ **a. U.S. MAIL (Pro Se Defendants)**
☒ **b. BY CM/ECF SYSTEM**

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ebony Davis
An Employee of Brownstein Hyatt Farber Schreck, LLP